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Attorney for Respondent  
Retrophin, Inc.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

LESLEY ZHU,  
  
Movant,  
  
v.  
  
RETROPHIN, INC.,  
  
Respondent.

Case No. 2:19-mc-00137-JAK (AGR)

**RETROPHIN, INC.'S NOTICE OF  
CROSS-MOTION AND CROSS-  
MOTION FOR AN ORDER TO SHOW  
CAUSE WHY ZHU SHOULD NOT BE  
HELD IN CONTEMPT**

DATE: AUG. 5, 2019  
TIME: 8:30 AM  
COURTROOM: 10B  
JUDGE: HON. JOHN A. KRONSTADT

**TO MOVANT AND HER ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on Monday, August 5, 2019, at 8:30 a.m., Retrophin, Inc., (“Retrophin”) by and through its undersigned counsel, pursuant to Rules 45 (f) and (g) of the Federal Rules of Civil Procedure and Rule 45 of the Local Rules of this Court, will oppose Movant Lesley Zhu’s Motion to Quash the Subpoena Ad Testificandum (“Motion”) and will cross move for an Order to Show Cause Why Zhu Should Not Be Held in Contempt (“Cross-Motion”) for failure to attend a deposition properly noticed by a Subpoena to Testify at a Deposition in a Civil Action, served on Zhu on June 17, 2019, before the Honorable John A. Kronstadt, United State District Judge, in Courtroom 10B of the U.S. Courthouse located at First Street Courthouse, 350 W. First Street, Los Angeles, CA 90012.

This Cross-Motion arises out of an underlying action captioned *Spring Pharmaceuticals, LLC v. Retrophin, Inc., et al.*, 2:18-cv-04553-JCJ (E.D.Pa.) in the United States District Court for the Eastern District of Pennsylvania, currently before Judge Joyner.

For the reasons set forth in the accompanying Memorandum of Points and Authorities and in Philip Bowman’s supporting declaration, the Court should order Zhu to appear and testify at a deposition at Cooley LLP, 1333 2nd St, Suite 400, Santa Monica, CA 90401, at a date ordered by the Court, or at such time and place as may be agreed by the parties, and to show cause as to why the Court should not hold her in contempt.

Although this Cross-Motion is noticed for August 5, 2019 (and the Motion is scheduled to be heard on November 18, 2019) we respectfully ask the Court to set a hearing on both the Motion and this Cross-Motion as soon as the Court’s schedule allows because of deadlines in the underlying action. Specifically, Judge Joyner’s order staying Retrophin’s motion to dismiss plaintiff Spring Pharmaceuticals, LLC’s complaint for 90-days and ordering jurisdictional discovery on Spring, is set to expire

1 on July 8, 2019.

2 This cross-motion is made following the conference of counsel pursuant to L.R.  
3 7-3, which first began on June 19, 2019.